

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#:
DATE FILED: 3/12/24

EPSTEIN SACKS PLLC
ATTORNEYS AT LAW
100 LAFAYETTE STREET - SUITE 502
NEW YORK, N.Y. 10013
(212) 684-1230
Fax (212) 571-5507

BENNETT M. EPSTEIN: (917) 653-7116
SARAH M. SACKS: (917) 566-6196

March 12, 2024

Hon. Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
United States District Court
40 Foley Square
New York, NY 10007

Filed on ECF

Re: *United States v. Marvin Minott*; 21 Cr. 702 (ALC); Request for Extension of Time for
Probation to Provide Initial Disclosure and Final PSR

Dear Judge Carter:

We represent the defendant Marvin Minott pursuant to the Criminal Justice Act. We write to ask the Court to allow more time for Probation to file its initial disclosures and final presentence report. We ask for this extension on behalf of Probation because we have not yet been able to hold the presentence interview. Probation Officer Jill Jeffries planned to meet, and did meet, with counsel at the MDC to have the interview on Thursday morning March 7th. However, we when arrived at the MDC at 9AM we were advised that the MDC would not let any visitors in since they were about to perform an emergency count. Understandably, Officer Jeffries could not stay to wait for the count to be over to conduct the interview. Undersigned counsel waited through the count to visit with other clients and can share that legal visitation did not resume until approximately 12PM.

Given counsels' schedules, the first date we could reschedule the interview for is Thursday April 4th, which is after the current initial disclosure date of April 1st. For these reasons, we respectfully ask that the Court extend the initial disclosure and final PSR disclosure dates to allow for sufficient time after our scheduled interview for Probation to complete the draft and final presentence report. We have discussed this request with the Government, and they have no objection.

The application is **GRANTED**.
So Ordered.

Respectfully submitted,

Sarah M. Sacks

Andrew L. Carter, Jr. 3/12/24